

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ADAM GINGOLD

Plaintiff,

v.

**BON SECOURS CHARITY HEALTH
SYSTEM**

Defendant.

Civil Action No. 08 CIV 2364 (SCR)

JUDGE ROBINSON

NOTICE OF MOTION

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Ellen A. Fischer, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Names: Darren Creasy and Sidney Steinberg
Firm Name: Post & Schell, P.C.
Address: 4 Penn Center, 1600 John F. Kennedy Blvd
City/State/Zip: Philadelphia, PA 19103
Phone Number: (215) 587-6632
Fax Number: (215) 320-4157

Darren Creasy is a member in good standing of the Bar of the States of New Jersey and Pennsylvania. Sidney Steinberg is a member in good standing of the Bar of Pennsylvania.

There are no pending disciplinary proceedings against Darren Creasy or Sidney Steinberg in any State or Federal Court to the knowledge of the undersigned.

Dated: Poughkeepsie, New York
August 22, 2008

Respectfully yours,

The Law Offices of
STEINBERG, SYMER & PLATT, LLP

By: Ellen A. Fischer
SDNY Bar: EF-6893
27 Garden Street
Poughkeepsie, New York 12601
(845) 471-4455

TO: Michael H. Sussman, Esq.
SUSSMAN & WATKINS
Attorneys for Plaintiff
PO Box 1005
Goshen, New York 10924

Sidney R. Steinberg, Esq.
Darren M. Creasy, Esq.
POST & SCHELL, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ADAM GINGOLD

Plaintiff,

v.

**BON SECOURS CHARITY HEALTH
SYSTEM**

Defendant.

Civil Action No. 08 CIV 2364 (SCR)

JUDGE ROBINSON

**AFFIDAVIT OF ELLEN A.
FISCHER IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

ELLEN A. FISCHER, ESQ., being duly sworn, hereby deposes and says as follows:

I am a member of Steinberg, Symer & Platt, LLP, counsel for Defendant Bon Secours Charity Health System in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of defendant's motion to admit Darren Creasy and Sidney Steinberg as counsel *pro hac vice* to represent defendant in this matter.

I am a member in good standing of the bar of the State of New York, and was admitted to practice law on April 13, 1994. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

I have known Darren Creasy and Sidney Steinberg since 2005.

Mr. Creasy is an associate of Post & Schell, P.C. in Philadelphia, Pennsylvania. Mr. Steinberg is a partner in that firm.

I have found Mr. Creasy and Mr. Steinberg to be skilled attorneys and persons of integrity. They are experienced in Federal practice and familiar with the Federal Rules of Procedure. Each is in good standing with the Courts of the State in which he is admitted (See Exhibit "A").

Accordingly, I am pleased to move for the admission of Darren Creasy and Sidney Steinberg, *pro hac vice*.

I respectfully submit proposed orders granting the admission of Darren Creasy and Sidney Steinberg, *pro hac vice*, which are attached hereto as Exhibit "B."

WHEREFORE, it is respectfully requested that the motion to admit Darren Creasy and Sidney Steinberg, *pro hac vice*, to represent the defendant in the above-captioned matter, be granted.

Dated: Poughkeepsie, New York
August 22, 2008

ELLEN A. FISCHER

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X 08 CIV 2364 (SCR)

ADAM GINGOLD,

Plaintiff,

AFFIDAVIT OF SERVICE

-against-

BON SECOURS CHARITY HEALTHY SYSTEM,

Defendant.

-----X

STATE OF NEW YORK)

SS.:

COUNTY OF DUTCHESS)

AMY PREUSS, being duly sworn, deposes and says: I am not a party to this action, am over 18 years of age, and reside at Hyde Park, New York.

On August 22, 2008, I served a true copy of the annexed NOTICE OF MOTION and supporting papers by mailing the same in a sealed envelope, with postage prepaid thereon, in a post office or official depository of the U.S. Postal Service within the State of New York, addressed to the addressees as indicated below:

Michael H. Sussman, Esq.
SUSSMAN & WATKINS
Attorneys for Plaintiff
PO Box 1005
Goshen, New York 10924

POST & SCHELL, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808

AMY PREUSS

Sworn to before me
on August 22, 2008.

NOTARY PUBLIC

Supreme Court of New Jersey

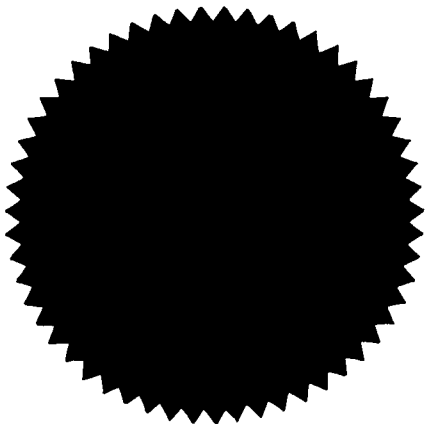


Certificate of Good Standing

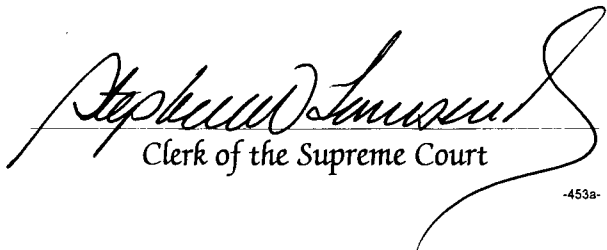
This is to certify that **DARREN MICHAEL CREASY**
(No. **022022003**) was constituted and appointed an Attorney at Law of New
Jersey on **December 04, 2003** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
11TH day of August , 20 08


Clerk of the Supreme Court



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Darren Michael Creasy, Esq.

DATE OF ADMISSION

November 14, 2003

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 23, 2008

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Sidney R. Steinberg, Esq.

DATE OF ADMISSION

December 19, 1988

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 23, 2008

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ADAM GINGOLD

Civil Action No. 08 CIV 2364
(SCR)

Plaintiff,

JUDGE ROBINSON

v.

BON SECOURS CHARITY HEALTH SYSTEM

Defendant.

ORDER FOR ADMISSION PRO
HAC VICE ON WRITTEN MOTION

Upon the motion of Ellen A. Fischer, a member of Steinberg, Symer & Platt, LLP, attorneys for BON SECOURS CHARITY HEALTH SYSTEM and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Darren Creasy
Firm Name: Post & Schell, P.C.
Address: 4 Penn Center, 1600 John F. Kennedy Blvd
City/State/Zip: Philadelphia, PA 19103
Phone Number: (215) 587-6632
Fax Number: (215) 320-4157
Email Address: dcreasy@postschell.com

is admitted to practice *pro hac vice* as counsel for BON SECOURS CHARITY HEALTH SYSTEM in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

DATED:
City, State:

United States District/Magistrate Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ADAM GINGOLD

Civil Action No. 08 CIV 2364
(SCR)

Plaintiff,

JUDGE ROBINSON

v.

BON SECOURS CHARITY HEALTH SYSTEM

Defendant.

ORDER FOR ADMISSION PRO
HAC VICE ON WRITTEN MOTION

Upon the motion of Ellen A. Fischer, a member of Steinberg, Symer & Platt, LLP, attorneys for BON SECOURS CHARITY HEALTH SYSTEM and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Sidney Steinberg
Firm Name: Post & Schell, P.C.
Address: 4 Penn Center, 1600 John F. Kennedy Blvd
City/State/Zip: Philadelphia, PA 19103
Phone Number: (215) 587-6632
Fax Number: (215) 320-4157
Email Address: ssteinberg@postschell.com

is admitted to practice *pro hac vice* as counsel for BON SECOURS CHARITY HEALTH SYSTEM in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

DATED:
City, State:

United States District/Magistrate Judge